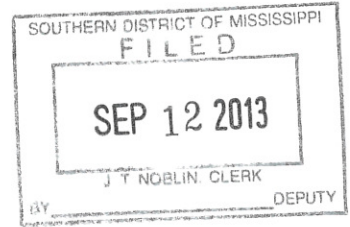


UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION



Robert Bryant

Plaintiff

v.

No. 3:13CV569 WHB-RHW

Isaiah Enterprises, LLC  
And Vivian Batshou

Defendants

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COMPLAINT

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The plaintiff, Robert Bryant, file this suit against Isaiah Enterprises, LLC, and Vivian Batshoun for violations of the overtime provisions of the Fair Labor Standards Act. 29 U.S.C. § 201 *et. seq.*

*Jurisdiction*

1. This Court has jurisdiction over this matter pursuant to 29 U.S.C. § 1331.

*Parties*

2. The plaintiff is resident of Hinds County, Mississippi. The plaintiff was an employee of the defendants as defined by the Fair Labor Standards Act, 29 USC § 203(d).
3. The defendant Isaiah Enterprises, LLC, is an employer as defined by the Fair Labor Standards Act.
4. As an officer, director and/or manager of the corporate defendant, Vivian Batshoun, is an employer as defined by the Fair Labor Standards Act.

*Facts*

5. The defendant Isaiah Enterprises does business as Select 10 Motel in Jackson, Mississippi.
6. The plaintiff was employed as a maintenance employee from May 21, 2013 until August 28, 2013.

**JURY TRIAL REQUESTED**

7. The plaintiff was a non-exempt employee under the Fair Labor Standards Act and was entitled to compensation of a minimum of \$7.25 an hour and 1½ times his regular rate for all hours worked over 40 in each work week.

8. The plaintiff regularly worked 100 plus hours per week.

9. Payments to the plaintiff were sporadic and unpredictable. At first, the plaintiff only received \$20 cash every other day. In total, the defendants paid the plaintiff wages of \$2,293 for all the time he worked. The defendants paid the plaintiff in kind the amount of \$2,400 in the form of free lodging.

*Violations of Law*

10. The defendants failed to pay the plaintiff the minimum wage and 1½ times his regular rate for all overtime hours.

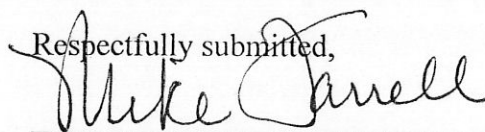
11. The defendants' violation was willful and intentional.

*Request for Relief*

13. The plaintiff requests compensation based on the overtime provisions of the Fair Labor Standards act for all hours worked for the defendant in an amount to be determined at trial.

15. The plaintiff requests an equal amount in liquidated damages, prejudgment interest, costs plus reasonable legal fees.

Dated: September 12, 2013.

Respectfully submitted,  


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